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PartnerRe Ireland Insurance DAC,
Starr Indemnity & Liability Company and
Certain Underwriters at Lloyd's, London*

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

SECURITIES AND EXCHANGE
COMMISSION, et al.

Case No.: 3:16-CV-00438-JR

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC, et al.,

Defendants.

**SECOND SUPPLEMENTAL
DECLARATION OF JOHN L.
WILLIAMS IN SUPPORT OF
INTERESTED INSURERS' MOTION
TO INTERVENE FOR LIMITED
PURPOSE AND FOR RELIEF FROM
STAY**

2nd SUPPLEMENTAL DECLARATION OF JOHN L. WILLIAMS IN SUPPORT OF MOTION TO INTERVENE
CASE NO.: 3:16-CV-00438-JR



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I, JOHN L. WILLIAMS, declare as follows:

1. I am an attorney licensed to practice in the states of Washington and California and admitted to practice before the Fourth Circuit, Ninth Circuit and Eleventh Circuit United States Courts of Appeal. I am a member of the Cozen O'Connor law firm and counsel for Forge Underwriting Ltd., PartnerRe Ireland Insurance DAC, Starr Indemnity & Liability Company and Certain Underwriters at Lloyd's, London (collectively "Insurers"). I submit this declaration in support of the Insurers' Motion to Intervene for Limited Purpose and for Relief from Stay (Docket No. 685) I have personal knowledge of the matters stated herein and if called as a witness, I could and would competently testify to thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of email communications between me and the Receiver's insurance coverage counsel, Stanley Shure, dated, August 17, 2018, August 22, 2018 and April 15, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 22nd day of May 2019, at Seattle, Washington.

By: _____

JOHN L. WILLIAMS

Williams, John L.

From: Williams, John L.
Sent: Monday, April 15, 2019 3:35 PM
To: 'Stanley Shure'
Cc: Hess, Jordan A.; Buckner, Bonnie
Subject: RE: Aequitas

Stan:

Thanks for speaking with me again today regarding the below. We appreciate your client's prompt response. As always, feel free to call me if you want to discuss further or have questions.



John L. Williams
Cozen O'Connor
999 Third Avenue, Suite 1900 | Seattle, WA 98104
P: 206-224-1288 F: 866-537-7536
[Email](#) | [Bio](#) | [Map](#) | [cozen.com](#)

From: Stanley Shure <sshure@shurelaw.com>
Sent: Wednesday, August 22, 2018 8:51 AM
To: Williams, John L. <JLWilliams@cozen.com>
Cc: Jones, Thomas M. <TJones@cozen.com>; David A. Muller <dmuller@baileycav.com>; Eryk R. Gettell <erg@severson.com>; Hess, Jordan A. <JHess@cozen.com>; Buckner, Bonnie <BBuckner@cozen.com>; Salvatore Picariello <spicariello@gmail.com>; Troy Greenfield <TGreenfield@SCHWABE.com>
Subject: RE: Aequitas

Hi John,

Thanks for your message below. The Receiver has long been prepared to proceed with a declaratory judgment action. However, in an effort to avoid potentially unnecessary litigation, the Receiver spent considerable time and effort to organize the August 22-23 mediation, involving all of the Aequitas investors, all of your clients' insureds and all insurance carriers.

We appreciate that you are new to this matter. However, the communication below on the eve of mediation is counter-productive. In the event that the Receiver concludes that the parties to the mediation have all made good faith efforts to resolve the various claims, he will recommend that the Court lift the stay to allow for the prosecution of the declaratory judgment action appropriately forestalled by the cooperation of multiple parties in the pursuit of negotiated resolutions.

Regards,

Stanley H. Shure
Law Offices of Stanley H. Shure
2355 Westwood Blvd. #374
Los Angeles, CA 90064
Tel: 310.984.6945
Fax: 310.984.6945

Cell: 310.309.9571

Email: sshure@shurelaw.com

----- Original Message -----

Subject: Aequitas

From: "Williams, John L." <JLWilliams@cozen.com>

Date: Fri, August 17, 2018 1:28 pm

To: "sshure@shurelaw.com" <sshure@shurelaw.com>

Cc: "Jones, Thomas M." <TJones@cozen.com>, "David A. Muller" <dmuller@baileycav.com>, "Eryk R. Gettell" <erg@severson.com>, "Hess, Jordan A." <JHess@cozen.com>, "Buckner, Bonnie" <BBuckner@cozen.com>

Stan:

Thank you for speaking with me yesterday afternoon. As I advised, Cozen O'Connor has been retained by Starr, Forge/PartnerRe Ireland and Certain Underwriters at Lloyd's to seek a lifting of the stay in the SEC action to allow them to bring an action for declaratory relief on coverage issues that are currently in dispute. Pursuant to Oregon federal district court Local Rule 7, I ask that you advise me if the Receivership Entity will stipulate to a lifting of the stay for that limited purpose or agree not oppose the motion.

Please feel free to call me if you have any questions or want to discuss.

Thanks.



John L. Williams
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